Docket No.: 122.1290

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of:

Keisuke KUBOMURA et al.

Serial No. 08/938,706 Group Art Unit: 2176

Confirmation No. 3138

Filed: September 26, 1997 Examiner: C. Paula

For: INFORMATION PROCESSING APPARATUS AND PROGRAM STORAGE MEDIUM

APPELLANT'S REPLY BRIEF

Assistant Commissioner for Patents
Washington, D.C. 20231

Sir:

This is in response to the Examiner's Answer mailed August 13, 2002 , and having a period for response set to expire on October 13, 2002 .

The following Reply Brief is respectfully submitted. Reconsideration of the claims is respectfully requested.

INTRODUCTION

The present invention is directed to a system for displaying newly-opened windows or areas that are displayed within an enlarged or magnified view.

CLAIMS 1 AND 11

Claims 1 and 11 particularly relate to calculating a second magnification rate for a newly opened intended area, where the second magnification rate is determined from an intended area's pre-enlarged size *and* it size according to a first magnification rate.

The Examiner acknowledged that Warnock does not teach determining a second magnification rate for said second intended area, and used Niles to allegedly supply the missing feature. In particular, the Examiner's Response to Argument (Answer) on page 16 states that "The magnified version of the document depends on the first pre-enlarged document **size**, and the **size** of the magnified document window". Applicants argued that the adjustment takes into account both the pre-enlarged size and the size according to the first

magnification rate, to determine the second magnification rate. The Answer proposed that "The magnified version of the document [i.e. Niles' pop-up window] depends on the first pre-enlarged document **size**, and the **size** of the magnified document window". However, the size of the first pre-enlarged document is not based on a magnification **rate**.

Niles discusses a magnified pop-up window of a base window (focus page p(i)) that is not magnified. The focus page of Niles is displayed according to the resources available to the system. Niles' display calculator 14 calculates the display layout using "information concerning the availability of system resources such as memory, temporary file space, number of available display gray levels, and screen size" (col. *, lines *). This display layout is then used to display the focus page ("The resolution at which the image representing the focus page p(i) is displayed is defined as the calculated display resolution in the display layout"; col. *, lines *-*). In sum, Niles calculates an initial layout topography based on system resources, and then force-fits the pages of the document in to the regions of the layout. Thus, the focus page is displayed or sized based on a magnification rate. Niles later confirms this understanding, stating "Each image representing a page of a document displayed on screen 32 is displayed ... at a **predetermined size or resolution**." A predetermined size is not a magnification rate.

Nowhere does Niles discuss using a first magnification **rate** to determine a second magnification rate. The pages of the documents in Niles are displayed based on their index, not on a magnification rate. The only magnification rate mentioned in Niles is the magnification of the focus document p(i) within the pop-up window, which involves simply one magnification rate; the rate of the pop-up window.

CLAIM 3

The Examiner acknowledges that Warnock does not teach correcting said magnification rate and used Niles to allegedly supply the missing feature. In particular, the claim 3 relates to using an area size and a size of a display screen. Because all of the pages in Niles are displayed according to their index relative to the focus page, switching the magnified window from the focus page to one of the other non-focus pages, as suggested by the Examiner, would not involve any change in magnification basis, the non-focus pages in Niles are not displayed using an area size and a size of a display screen.

CLAIMS 4, 5, AND 12

Claim 4 recites "**determining** *a second magnification rate* for said second intended area *that enlarges said first intended area to said second intended area* **from** a size of the character in a first intended pre-enlarged area as displayed on the screen, **and** a size of the character in an area surrounding said first intended area on said display screen **when** said detection means detects that a request is issued for opening said second intended area". The Answer on page 17 proposes that the claims do not refer to how to enlarge based on character size.

The Merriam Webster Dictionary describes a meaning of "from" to be "used as a function word to indicate the source, cause, agent, **or basis** <we conclude from this> <a call from my lawyer> <inherited a love of music from his father> <worked hard from necessity>". The second magnification rate, which is for the second intended area, and which enlarges the first intended area to the second intended area, is determined **from** character sizes. The cited prior art references do not discuss this aspect of the claims.

CLAIM 6

Claim 6 recites that magnification rate is adjusted to cause the new window to reflect the size of the previously viewed characters. The Answer on page 18 asserts that there is no modification of the second intended area. However, the second intended area is an area within which the first intended area is displayed in enlarged form. Character size can be maintained by increasing the area of the intended area without increasing the magnification rate. Thus, the second area can hold the first intended area in "enlarged form" while maintaining the character size.

CLAIMS 7, 8, AND 13

The Answer on page 18 states that "a specified character size" is not recited in claim 7 or claim 13. Claims 7 and 13, as certified by item (8) of the Examiner's Answer, clearly recite "a specified character size". See line 10 of claim 7, and line 11 of claim 13. Claim 8 depends from claim 7.

CLAIMS 9 AND 14

Claim 9 recites "detecting whether the trailing end of said second intended area

scrolled in said scrolling direction ... has reached a state displayable on said display screen **when** up to an area adjacent to and surrounding said second intended area is scrolled", and "prohibiting said second intended window from being further scrolled in said scrolling direction". The preamble of claim 9 makes it clear that the second intended area is being displayed ("displaying ... in a newly intended area opened on the screen").

The Answer on pages 18 and 19 states that scrolling prohibition would be obvious in Warnock to stop the scrolling at a predetermined point, such as the end of a page. However, in Warnock, when the end of a page is reached, the page is erased and a following page is displayed. Because the allegedly prohibited page is no longer being displayed, it cannot correspond to the second intended area of claim 9, which is scrolling-prohibited while being displayed. Furthermore, when Warnock's original page is scrolled to the bottom (or the top), the next/previous page is automatically displayed. Because the original page is no longer displayed it cannot be scrolled, and naturally it cannot be prohibited from scrolling.

CLAIMS 10 AND 15-26

Claim 10 recites "restoring and displaying on said display screen a display state of said second intended area immediately before being opened on the basis of the coordinate stored in said memory means when erasing said second intended area". In other words, the second intended area has a display state immediately before being opened. A coordinate in that pre-opening display state is captured, and is used as a basis for restoring when the second intended area is erased. The claims recite both opening the second intended area and restoring before erasing the second intended area.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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